

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Telecommunications Relay Services )  
And Speech-to-Speech Services for )  
Individuals with Hearing and Speech )  
Disabilities )  
\_\_\_\_\_ )

CC Docket No. 98-67

**REPLY COMMENTS OF SPRINT CORPORATION**

Sprint Corporation ("Sprint") hereby respectfully submits its reply to the comments on the *Further Notice of Proposed Rulemaking* ("*Further Notice*") issued with the Commission's *Report and Order*, FCC-00-56, released March 6, 2000, in the above-referenced docket.

**I. A REQUIREMENT THAT SS7 TECHNOLOGY BE MADE AVAILABLE TO RELAY PROVIDERS CANNOT BE JUSTIFIED EITHER UNDER THE COMMUNICATIONS ACT OR ON THE BASIS OF A COST/BENEFIT ANALYSIS.**

In its initial comments (at 4-5), Sprint explained that the Commission lacks the authority under the Communications Act to require that carriers provide SS7 signaling to non-common carriers such as relay providers; that SS7 signaling is not a telecommunications service as that term is defined by the Act, *see* 47 U.S.C. §§153(43) and (46); and that the duties imposed upon common carriers by Sections 201(b), 225 and 255 of the Act, 47 U.S.C. §§§ 201(b), 225, 255, only govern to their provision of telecommunications services. Sprint also explained (at 6-7) that any benefits that would be realized by mandating that relay providers be required to utilize SS7 technology would be limited while the costs to relay providers of modifying their systems to accommodate SS7 technology would be substantial. Comments at 4-7.

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Among the few commenting parties urging the Commission to require the provision of SS7 signaling to non-common carriers, only TDI cites to specific statutory provisions that it says give the Commission the authority to adopt such a requirement. It argues (at 7) that the Commission's Title I mandate, 47 U.S.C. §151, as well as its general powers under 4(i), 47 U.S.C. §154(i) and its authority with respect to radio, 47 U.S.C. §303(r) gives the Commission the "authority to allow entities other than common carriers to purchase SS7 service." But none of these provisions enables the Commission to require common carriers to provide a non-telecommunications service. At most, such provisions simply give the Commission the authority to adopt regulations to carry out its explicit powers granted by the substantive provisions of the Act, *e.g.*, Title II. And, as stated, none of the Title II provisions governing common carrier regulation gives the Commission the authority to require that common carriers provide a non-telecommunications service such as SS7 signaling to non-common carriers. In short, TDI's reliance on Sections 151, 4(i) and 303(r) is misplaced.

Equally without merit is the notion expressed by NAD/TAN/CAN (at 14-15) that SS7 technology would eliminate what it terms are the "burdens" imposed on TRS users but not encountered by end users without disabilities. For example, contrary to NAD/TAN/CAN's view, SS7 signaling will not eliminate the need to manually develop a profile of TRS users. *See* Sprint at 5; WorldCom at 2; GTE at 6; Bell Atlantic at 2; SHHH at 6. Nor would the availability of SS7 technology improve the provision 911 service to TRS users. Sprint at 5-7; WorldCom at 4-5. In fact, the ability of TRS users to avail themselves of caller ID service would perhaps be the only benefit that would be realized if relay providers were required to utilize SS7 signaling. But as Sprint pointed out (at 6), other technologies are being developed that would allow the provision of caller ID services through the relay center without the need for relay providers to

spend the millions of dollars that would be necessary to be able to utilize SS7 signaling within their systems. *See also* Bell Atlantic at 3; GTE at 7. Thus, if the availability of call waiting services or any other service to TRS users is deemed necessary and desirable, the Commission should simply mandate that such services be offered and leave it to the industry to develop the most efficient technology to provide such services. In this way, the Commission would avoid "ossify[ing] its regulations around a particular technology." TDI at 10.

## **II. THE V.18 PROTOCOL SHOULD NOT BE REQUIRED.**

Similarly, the Commission should not mandate the use the V.18 protocol. Indeed, most of the commenting parties agree with Sprint that the use of such protocol would not significantly improve the provision of TRS service. As WorldCom points out (at 26), "mandating an older, less advanced standard as V.18 will...retard the pace of technological development." *See also* AT&T at 10-11.

NAD /TAN/CAN (at 31-32) appears to believe that the V.18 protocol "would enhance and bring about functionally equivalent telephone service access...." But it offers no examples to support its belief here and concedes "a modem incorporating V.18 capabilities has not yet been commercially produced nor proven in the marketplace." In short, there is simply no

justification to mandate the use of the V.18 protocol by relay providers.

Respectfully submitted,

SPRINT CORPORATION

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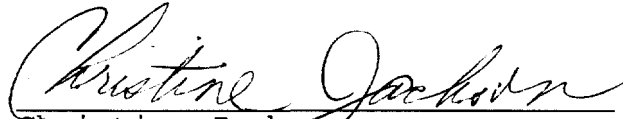
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July 5, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **REPLY  
COMMENTS OF SPRINT CORPORATION** was sent by hand or by United States first-class mail, postage prepaid, on this the 5<sup>th</sup> day of July, 2000 to the parties on the attached list.

  
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